

EXHIBIT “A”

IN THE CIRCUIT COURT OF SMITH COUNTY, MISSISSIPPI

ANNA MCDONALD

PLAINTIFF

VS.

NO. 2017-130-1

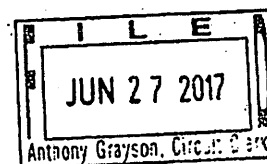
ALL STAR RECOVERY, LLC;
CREDIT ACCEPTANCE; RICHARD
HARRIGILL; STERLING GAY;
ABC; DEF; AND GHI

DEFENDANTS

COMPLAINT

Comes now ANNA MCDONALD, Plaintiff in the above styled and numbered cause, and files this her complaint against the Defendants, All Star Recovery, LLC; Credit Acceptance; Richard Harrigill; Sterling Gay; ABC; DEF; and GHI, and in support thereof would show unto the Court the following facts, to wit:

1. That the Plaintiff is an adult resident citizen of Smith County, Mississippi.
2. That the Defendant, All Star Recovery, LLC, is a resident Corporation of the State of Mississippi. That process may be served on said Defendant by service of process upon its registered agent, Capitol Corporate Services, Inc., 248 E Capitol Street, Suite 850, Jackson, Mississippi 39201.
3. That the Defendant, Credit Acceptance, is a nonresident Corporation of the State of Missouri. That process may be served on said Defendant by service of process upon its registered agent, Corporation Service Company, 5760 I-55 North, Suite 150, Jackson, Mississippi 39211.
4. That the Defendant, Richard Harrigill, is a resident of the state of Ohio. That process may be served on Defendant by service of process at Baymont Inn & Suites Boston Heights/Hudson 6731 Industrial Parkway, Hudson, Ohio 44236.



grabbed Plaintiff causing her to sustain bodily injuries and bruising to her arms and wrists and causing severe mental and emotional distress

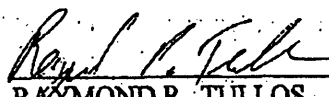
11. That the Defendant, Richard Harrigill, made verbal threats to the Plaintiff causing her to be afraid for her safety and the safety of her children who were present at the time of the incident herein described.

12. That the actions of the Defendants, and each of the Defendants, from Plaintiff's residence has resulted in much mental pain, anguish, worry, and anxiety to the Plaintiff. That the Plaintiff has been greatly embarrassed, degraded, and humiliated by the illegal actions of the Defendants, and each of the Defendants, and the Plaintiff is entitled to be compensated therefor.

13. That the actions of the Defendants, and each of the Defendants, toward the Plaintiff were of such a wanton, illegal, willful, and malicious nature as to evidence a gross and complete disregard of the rights of the Plaintiff to his property, and as a direct result of said actions, the Plaintiff is entitled to recover punitive damages from the Defendants in addition to actual damages.

WHEREFORE, Plaintiff demands judgment for actual damages of and from the Defendants, jointly and severally, in an amount that the jury feels is fair and reasonable, and for punitive damages in an amount the jury feels is fair and reasonable, and all costs of Court.

Respectfully submitted,


RAYMOND P. TULLOS
ATTORNEY FOR PLAINTIFF

RAYMOND P. TULLOS
Attorney for Plaintiff
Mississippi State Bar No. 103745
Post Office Box 74
Raleigh, Mississippi 39153
Telephone (601) 782-9362
Facsimile (601) 782-4212
raymond.tullos@tullosandtullos.com

IN THE CIRCUIT COURT OF SMITH COUNTY, MISSISSIPPI

ANNA MCDONALD
PLAINTIFF

VS.

NO. 2017-130-1

ALL STAR RECOVERY, LLC;
CREDIT ACCEPTANCE; RICHARD
HARRIGILL; STERLING GAY;
ABC; DEF; AND GHI

DEFENDANTS

**INTERROGATORIES AND REQUEST FOR PRODUCTION OF
DOCUMENTS PROPOUNDED TO THE DEFENDANTS**

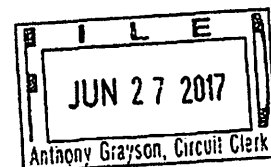
Comes now ANNA MCDONALD, Plaintiff in the above styled and numbered cause, and propounds these Interrogatories and Requests for Production of Documents pursuant to statute to be answered under oath by the Defendants, All Star Recovery, LLC; Credit Acceptance; Richard Harrigill; Sterling Gay; ABC; DEF; and GHI, in the manner and time as prescribed by law.

INTERROGATORIES

1. Please state the full name, address, and telephone number of each person whom you know or believe went to the Plaintiff's residence on or about September 16, 2016 attempting to take possession of the Plaintiff's vehicle.

2. Please state the full name, address, and telephone number of each person who were present in the attempted taking the Plaintiff's vehicle on about September 16, 2016.

3. Please list which of the individuals listed in the answers to the above interrogatories were employed by All Star Recovery, LLC, please state the date each individual commenced employment with said Defendant, and please describe the duties of each said employee.



4. Please list which of the individuals listed in the answers to the above interrogatories were employed by Credit Acceptance, please state the date each individual commenced employment with said Defendant, and please describe the duties of each said employee.

5. Please state the dates and time you and/or any other agents or representatives of All Star Recovery went to the Plaintiff's residence with reference to the taking of said vehicle.

6. Did you or any other agents, servants, or representatives ever discuss the matter of taking the vehicle with Plaintiff? If so, please give the names, addresses, and telephone numbers of the individuals who discussed this with Plaintiff, and please give the substance of their discussions with the Plaintiff. Please give the dates and places these discussions were held, and give the names, addresses, and telephone numbers of the individuals who were present when these conversations or discussions took place with the Plaintiff.

7. Did you or any other agents, servants or representatives obtain the consent or permission from the Plaintiff, or anyone else to take or remove or attempt to remove the vehicle from where it was located on September 16, 2016? If so, please give the names, addresses and telephone numbers of each person who obtained such consent, and give the name of the person who gave such consent and permission.

8. Please give the date and time that the Defendant present to take to vehicle from its location, and whether or not the vehicle was removed and the reason for the outcome.

9. How did you get to the location of the Plaintiff's residence in Smith County, Mississippi on the date of September 16, 2016? Please give the name, address and telephone number of the owner of the vehicle which delivered you to the Plaintiff's residence. Who was driving said vehicle when it arrived at the Plaintiff's residence? Who drove said vehicle from the Plaintiff's residence after you got out?

10. Please describe the vehicle which was used to deliver you to the Plaintiff's residence in Smith County, Mississippi, on September 16, 2016.

11. Please state what you did upon arrival at the Plaintiff's resident.

12. How many payments do you allege that the Plaintiff was in arrears on the vehicle at the time it was taken from him?

13. Please state the period of time you have been in the repossession business.

14 Please give your occupation and the names and addresses of your employers for the past 15 years.

REQUESTS

1. Any and all photographs taken by the Defendants or in the possession of the Defendants or Defendants' attorney of the Plaintiff's vehicle.

2. Any and all statements taken of any witnesses or parties to the repossession involved in this lawsuit, and any and all reports made of said incident.

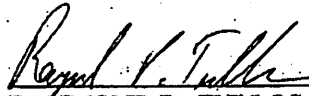
3. Did you, your agents, servants, or representatives obtain the consent or permission from the Plaintiff, or anyone else, to take and remove the vehicle from its location on September 16, 2016? If so, please give the names, addresses, and telephone numbers of each person who obtained such consent and the names of the person(s) who gave such consent and permission.

4. Please provide a list of all the witnesses whom the Defendants shall call upon the trial of this cause, together with a summary of the testimony of each of the witnesses.

5. Any and all letters, memorandums, and correspondence received by the Defendants or in the possession of the Defendants pertaining to any matters involved in this suit.

6. A financial statement showing the net worth of the Defendants on September 16, 2016.

Respectfully submitted,



RAYMOND P. TULLOS
ATTORNEY FOR PLAINTIFF

RAYMOND P. TULLOS
Attorney for Plaintiff
Mississippi State Bar No. 103745
Post Office Box 74
Raleigh, Mississippi 39153
Telephone (601) 782-9362
Facsimile (601) 782-4212
raymond.tullos@tullosandtullos.com